

EXHIBIT 60

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF MASSACHUSETTS
INA STEINER, DAVID STEINER, and) Case No. 1:21-CV-11181-PBS
STEINER ASSOCIATES, LLC,)
)
Plaintiffs,)
)
vs.)
)
EBAY, INC., et al.,)
)
Defendants.)
_____)

VIDEOTAPED DEPOSITION OF VERONICA L. ZEA

San Jose, California

Wednesday, September 11, 2024

REPORTED BY: Derek L. Hoagland

CSR No. 13445

<p style="text-align: right;">Page 38</p> <p>1 A. Yeah, he would -- I don't remember specific 2 incidences, per se. It was -- he would frequently ask I 3 was retarded or call me or other people retarded and he 4 would talk behind the backs of others, talk about other 5 analysts to me. And yeah, I mean, that was the main 6 thing is I don't like using that word; but he would use 7 it a lot, and that was a common one. Yeah, it was 8 mostly just insulting our intelligence or competence, as 9 he would say, yeah.</p> <p>10 Q. And was that -- would you describe that as 11 relatively frequent?</p> <p>12 A. Yeah.</p> <p>13 Q. Did it change over time, or did it stay constant 14 over time?</p> <p>15 A. It probably got more frequent. It started about 16 a year before this probably, where he was more 17 comfortable with us. And, yeah, it would become more 18 frequent, where he would yell at us or chastise us for 19 being incompetent or something like that.</p> <p>20 Q. In your letter to the Court, you explained that 21 Mr. Baugh would try to insight fear among the security 22 team.</p> <p>23 Do you remember that?</p> <p>24 A. Yes.</p> <p>25 Q. Is that what happened?</p>	<p style="text-align: right;">Page 40</p> <p>1 that the CEO's jet was getting diverted; and I am trying 2 to handle that and figure out what to do, and Dave 3 Harville walked in and just hung up the phone, pushed 4 the end button, and then he said there's an active 5 shooter on campus. What do you do? And -- or, no, I'm 6 sorry. He said smoke was filling the building, in this 7 one, I am conflating two instances. And then we had to 8 grab our go bags and everything and get outside, and 9 figure out how to work from out there.</p> <p>10 The active shooter one was more -- I don't 11 remember how it started, but Jim saying, like, "There's 12 an active shooter. We need to get outside." And then I 13 watched as other people tried to operate from inside my 14 manager's car; and he was hitting his hand on the roof 15 yelling, "bang, you're dead, you're dead." He would say 16 someone was dead, and they couldn't do anything anymore, 17 and lots of yelling and everything. Yeah.</p> <p>18 Q. What was that experience like for you?</p> <p>19 A. Scary. Nerve racking. Definitely high heart 20 rate and everything. Yeah.</p> <p>21 Q. In your letter, you described feeling on edge 22 constantly.</p> <p>23 A. Mm-hmm.</p> <p>24 Q. You also wrote that you were told that you were 25 at constant risk while you were an eBay employee?</p>
<p style="text-align: right;">Page 39</p> <p>1 A. Yes.</p> <p>2 Q. And in your view, was fear a tool that Mr. Baugh 3 would use to manipulate the security team?</p> <p>4 A. Yes.</p> <p>5 Q. How did he do that?</p> <p>6 A. Well, one of his big missions at one point was 7 to build a fence all around the campus, telling us all 8 that as a big, huge company, that we would receive a lot 9 of complaints from users, et cetera, that we were at 10 high risk of someone coming to the campus and being 11 violent.</p> <p>12 So he got this fence built, and he used -- there 13 was the situation of a shooter at the YouTube campus 14 that he had us build a presentation about and focus on, 15 saying we were at risk of that.</p> <p>16 He would have us go through the CEO's mail and 17 he even had people X-ray packages to see if there was 18 anything in them that was a bomb or something. So he 19 would frequently tell us how at risk we were, and then 20 he would also have us do like active shooter drills.</p> <p>21 Yeah.</p> <p>22 Q. Tell us about the active shooter drills. Would 23 you know that those were coming in advance?</p> <p>24 A. No. One that stands out in particular was I 25 received a phone call that I found out later was fake,</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Yeah.</p> <p>2 Q. Is that an accurate statement?</p> <p>3 A. Yes.</p> <p>4 Q. Is that because of the things, the types of 5 things you are describing?</p> <p>6 A. Yeah, mm-hmm.</p> <p>7 Q. Did Mr. Baugh also show the security team 8 graphic videos?</p> <p>9 A. Yes.</p> <p>10 Q. And by "graphic," I mean graphically violent 11 videos?</p> <p>12 A. Occasionally. Yes.</p> <p>13 Q. Do you remember any specific instances of those?</p> <p>14 A. I know there was -- I didn't see it myself; but 15 I know there was an incident where an employee jumped in 16 front of a train, and he showed that to people. There 17 were -- I don't know if it was him that showed us or if 18 they popped into our email, so I can't be sure, but we 19 would get emails showing like ISIS beheadings and 20 whatnot, and that would come up, and not super relevant 21 to our job, but still something we had to see 22 constantly. Yeah.</p> <p>23 Q. And when you describe ISIS beheadings, that's 24 Islamic state terrorist group?</p> <p>25 A. Yes.</p>